

James A. Watson
Rear Admiral, USCG
Federal On-Scene Coordinator

June 19, 2010

Dear Admiral Watson:

In compliance with the May 26, 2010, Dispersant Monitoring and Assessment Directive - Addendum 3 (the "Directive"), Houma Unified Command has eliminated the surface application of dispersants, except in cases where an exemption is requested and justified, and approved by the Federal On-Scene Coordinator.

Houma Unified Command has eleven (11) spotter visual reports from 19 June of multiple slicks of dispersible oil (Attachment 1) and the NOAA Surface Oil Forecast for 20 June shows extensive areas of heavy and medium oil (Attachment 2). Weather forecast indicates excellent flying weather with winds of 4-8 knots, wave height 0.5-1 feet, ceilings unlimited and visibility 10 nm; 40 per cent chance of thunderstorms in the area.

Houma Unified Command anticipates that, due to the weather, location, distribution (4,500 sqmi) and size of the multiple oil slicks identified the use of mechanical recovery and ISB to recover or remove the oil in the target area will be insufficient to remove the spill volume on June 20 2010. Prior to spray operations the spotter aircraft will identify the high value targeted slicks and will direct spray aircraft to the heaviest portions of the slick.

Pursuant to a request this date from Unified Command, the following information is provided.

- Estimated size of identified dispersible oil slick targets proposed in designated zones: this information is included in Table 1 with the estimate of the amount of dispersant needed to treat these slicks.
- Explicit justification for why these targets can't be skimmed or addressed by other mechanical means: The use of mechanical recovery to recover or remove the oil in the identified target areas will be insufficient to remove the estimated dispersible oil volumes that we have estimated for tomorrow. The targeted oil herein is dispersible oil and dispersible oil is not the only oil demanding mechanical recovery assets. The geographic area of the spill site contains a combination of dispersible oil, heavy sheens and emulsified oil. Mechanical recovery devices are required elsewhere throughout the entire geographic area to address all areas and all oils that can be recovered mechanically and not just the dispersible oils and are therefore otherwise engaged. Generally the skimming vessels are concentrated near the source site so that they can remain in the

7/12/2010

Page 2

heaviest oil and collect the highest volume of oil. Other skimming assets are deployed nearshore to recover oil before it comes ashore.

- Tabulation of number of assets (skimmers, etc.) in service today and how many assets are available yet not in service: A daily summation of skimmers in the source area and outside the source is now being provided daily to the Aerial Dispersant Group for insertion in this report (Attachment 3). Our review of the assets listed below reveal that they are engaged in skimming operations with some out of service for various reasons.
- It is planned to conduct multiple Tier 1 helicopter SMART overflights to observe dispersant operations. Additionally, the M/V *International Peace* will be returning to port for the transfer of samples and re-provisioning. The QA/QC report on the SMART Tier 1 observations for the 18th will be provided to EPA tomorrow morning.

Accordingly, in accordance with the Directive, the Houma Unified Command respectfully requests an exemption to apply EC9500A in volumes on oil slicks located today shown in Table 1 not to exceed 15,500 gallons for a period not to exceed 12 hours.

Sincerely,

Houma Unified Command

Exemption approved subject to the above:



James A. Watson
Rear Admiral, USCG
Federal On-Scene Coordinator

Date: 6-19-20

Dispersant Zone Map for 20 June 2010 with Oil Targets from Spotter Operations on 19 June

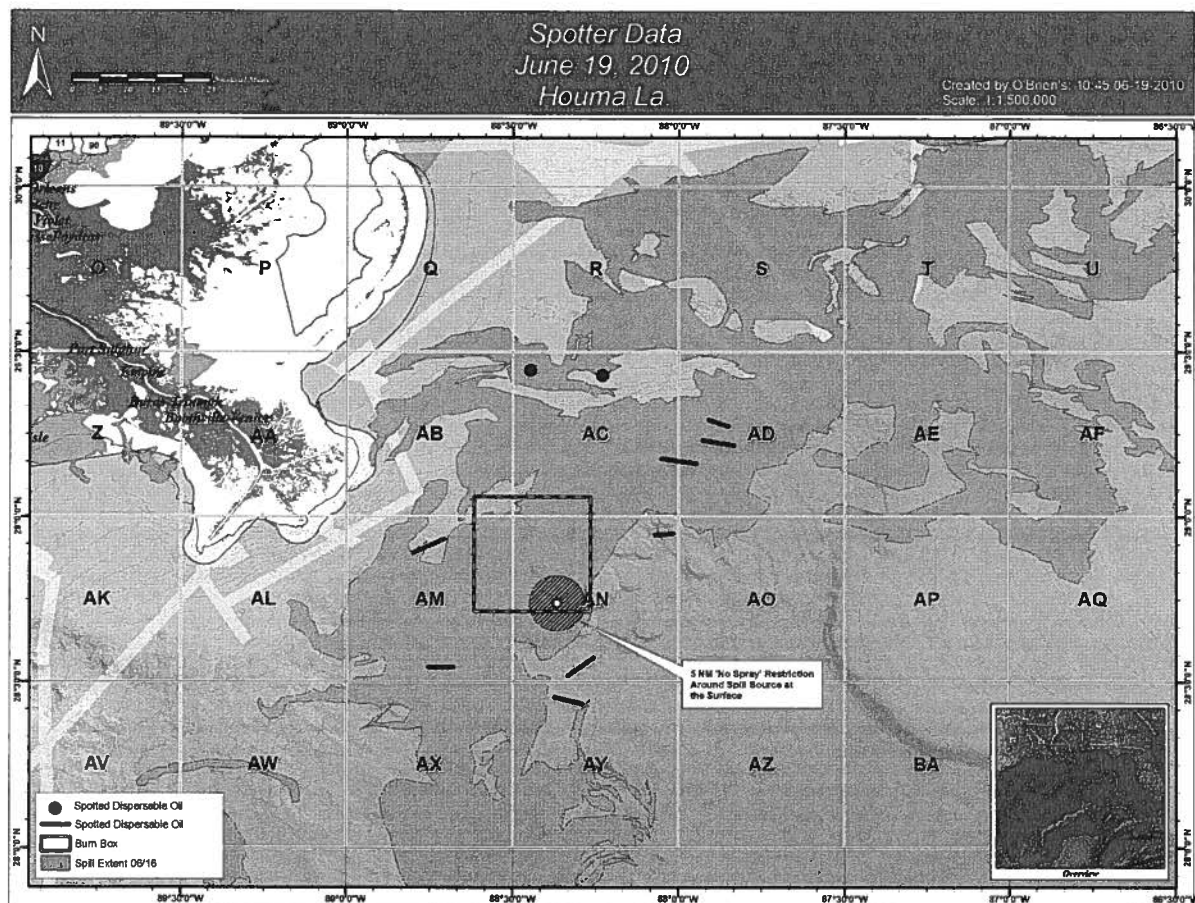


TABLE 1
Dispersible Oil Report June 19, 2010

Zone	# of slicks reported	Area in acres	Estimated percentage dispersible oil	Dispersant Needed (1/20 DOR)
AC	3	280	20-50	600
AD	3	1,172	30-50	2,611
AM	3	12,198	15-60	9,638
AN	3	2,880	15-20	2,480
AY	1	127	20	130
TOTAL				15,459

Note: Table 1 shows our intentions based upon our observations the day before these actions take place. Size and location of slicks will change. Activities within slick areas e.g., skimming operations, in-situ burning, etc., or weather conditions may require revisions to the actual operational plan implemented.

7/12/2010

Page 4

Attachment 2

Nearshore Surface Oil Forecast Deepwater Horizon MC252

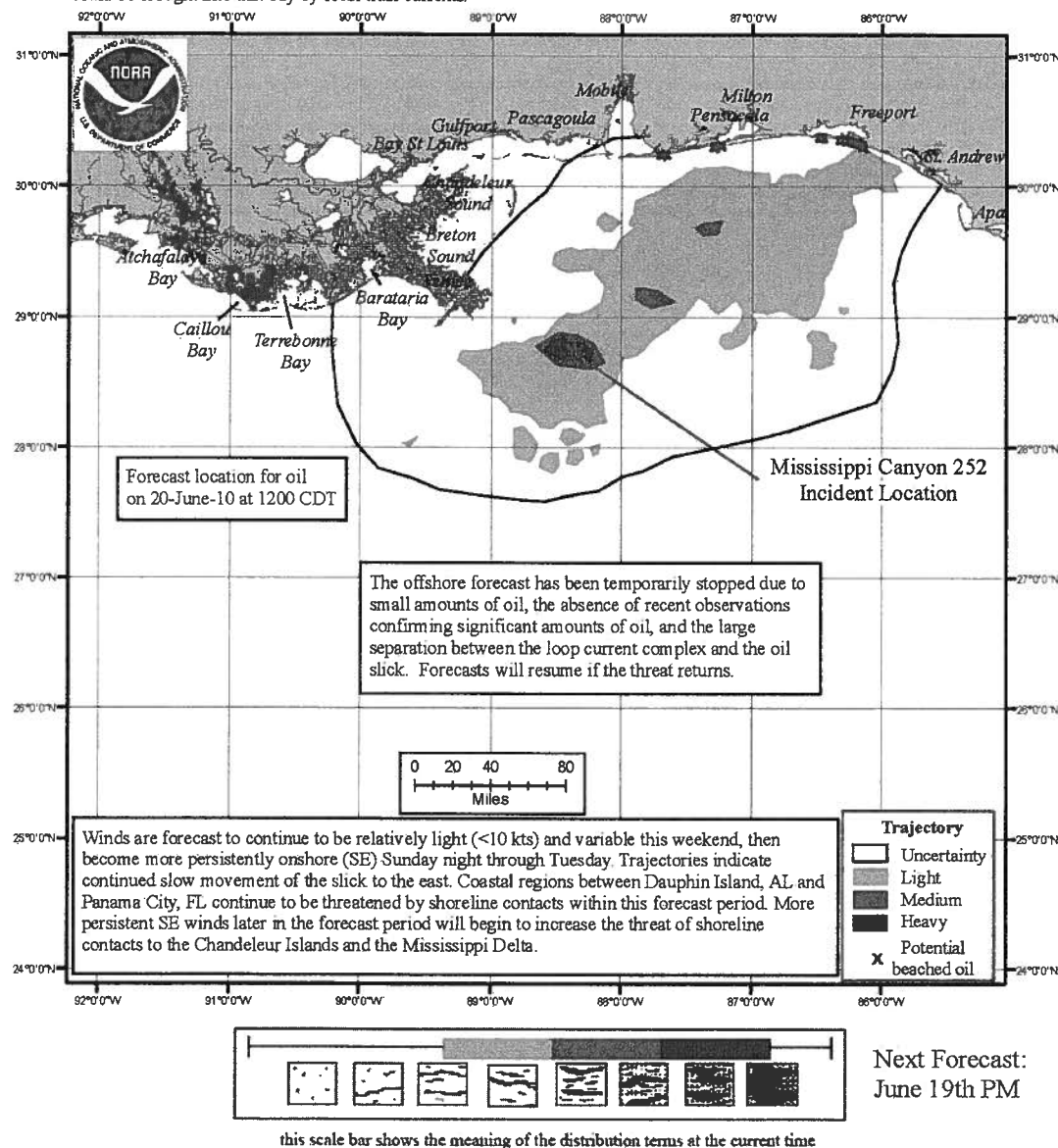
NOAA/NOS/OR&R

Nearshore

Estimate for: 1200 CDT, Sunday, 6/20/10

Date Prepared: 2100 CDT, Friday, 6/18/10

This forecast is based on the NWS spot forecast from Friday, June 18 PM. Currents were obtained from several models (West Florida Shelf/USF, TGLO/TAMU, NAVO/NRL) and HFR measurements. The model was initialized from Thursday-Friday satellite imagery analysis (NOAA/NESDIS) and Friday overflight observations. The leading edge may contain tarballs that are not readily observable from the imagery (hence not included in the model initialization). Oil near bay inlets could be brought into that bay by local tidal currents.



7/12/2010

Attachment 3

Offshore Skimming Resources

		SOURCE		Date/Time 19 June 1500		
Designator	Kind/Type	Vessel	Assignment	Status	Location	ETA
LAR	RV1/Weir	Louisiana Responder	MSRC	Skimming	MC-252	
CCR	RV1/Weir	Gulf Coast Responder	MSRC	Skimming	MC-252	
TXR	RV1/Weir	Texas Responder	MSRC	Skimming	MC-252	
NER	RV1/Weir	Maine Responder	MSRC	Skimming	MC-252	
MSR	RV1/Weir	Mississippi Responder	MSRC	Skimming	MC-252	
SDR	RV1/Weir	Southern Responder	MSRC	Skimming	MC-252	
DER	RV1/Weir	Delaware Responder	MSRC	Skimming	MC-252	
VAR	RV1/Weir	Virginia Responder	MSRC	Pit stop	Ft Jackson	
FLR	RV1/Weir	Florida Responder	MSRC	Reassigned Mobile	Mobile	
NJR	RV1/Weir	New Jersey Responder	MSRC	Reassigned Mobile	Mobile	
HOSS	RV1/Belt	CGA HOSS Barge (Crosby Sun)	TF HOSS	Skimming	MC-252	
SV	RV1/Weir	Seacor Vanguard (Current Buster 2 ea)	Buster	Skimming	MC-252	
JC	RV1/Weir	John Coghill (Current Buster)	Buster	Skimming	MC-252	
LR	RV1/Weir	Lana Rose (NRC VOSS)	NRC	Equipment	MC-252	
PER	RV1/Belt	NRC Perseverance	NRC	Mechanical	MC-252	
LF	RV1/Belt	Lynne Frink (NRC Marco)	NRC	Skimming	MC-252	
LIB	RV1/Disk	NRC Liberty (Disc)	NRC	Skimming	MC-252	
NG	RV1/Weir	Noonle G (w/CGA FRU)	CGA	Skimming	MC-252	
IF	RV1/Weir	International Trooper (w/CGA FRU)	CGA	Skimming	MC-252	
CAR	RV1/Weir	Ms. Caroline (w/CGA FRU)	CGA	Skimming	MC-252	
MA	RV1/Weir	Mr. Alex (w/CGA FRU)	CGA	Mechanical	MC-252	
RE	RV1/Belt	Rene (Navy Marco)	Fed	Equipment	MC-252	
RP	RV1/Belt	Resolve Pioneer (NRC Marco)	NRC	Reassign Non-Source	Non-Source	
PT	RV1/Weir	Pauline T (NRC VOSS)	NRC	Reassign Non-Source	Non-Source	
SW	RV1/Weir	Seacor Washington (Dutch arm)		Reassign Non-Source	MC-252	
HM	RV1/Weir	HOS Msylique (Dutch arm)		Reassign Non-Source	Non-Source	
SW	RV1/Weir	Sweetwater (Dutch Arm)		Reassign Non-Source	Non-Source	
JMC	RV1/Weir	Ocean Raider 17/JMC3009	Guip	Reassigned Mobile	Mobile	
AD	RV1/Belt	NRC Admiral	NRC	Reassign Non-Source	Non-Source	
SH	RV1/Disk	Seahorse VI (NRC VOSS)	NRC	Reassign Non-Source	Non-Source	
PT	RV1/Weir	Pauline T (NRC VOSS)	NRC	Reassign Non-Source	Non-Source	
REC	RV1/Weir	Ampol Recovery (w/ CGA FRU)	CGA	Reassigned Mobile	Mobile	
RES	RV1/Weir	Ampol Responder (w/ CGA FRU)	CGA	Reassigned Mobile	Mobile	
402	TV2	MSRC 402 Barge (Kimberly Colle)	TF Storage	On-scene	MC-252	
452	TV1	MSRC 452 Barge (Tara Crosby)	TF Storage	Standby	Ft Jackson	
570	TV1	MSRC 570 Barge (Crosby Clipper)	TF Storage	Standby	White Tail	
155	TV1	K-Sea DBL-155 (Rebel)	TF Storage	On-scene	MC-252	

7/12/2010

Costner	TV1	Energy 8001(Superior Service) Costner	TF Storage	On-scene	MC-252	
Boom Boats						
Designator		Vessel	Assignment		Location	ETA
CC	WB2	Chanese G	Source	Standby	Venice	
SF	WB2	Sea Fox	Source	Standby	Venice	
BG	WB2	Betty G	Source	Boom tow	MC 252	
MSA	WB2	Ms. Alissa	Source	Boom tow	Venice	
MSE	WB2	Ms. Addison	Source	Mechanical	Venice	
JN	WB2	Julienne Marie	Source	Standby	Venice	
SI	WB1	St. Ignatius Loyola	Source	Boom tow	MC 252	
HE	WB1	Hercules	Source	Boom tow	Enroute	
BR	WB1	Brutus	Source	Boom tow	MC 252	
MM	WB1	Mia Makoy	Source	Boom tow	MC 252	
MR	WB1	Mr Randolph	Source	Boom tow	Enroute	
SH	WB2	Sea Hawk	Source	Standby	Venice	
Crew/Re-supply						
ML	WB2	Mr. Leroy	Shuttle/Re-su	Supply Run	Venice Based	
FO	WB2	Fox	Ampol Re-sup	Supply Run	Venice Based	
JP	WB2	Jean Perry (Drop Box)	Shuttle/Re-su	Supply Run	Venice Based	
CS	WB4	Corissa Shane	Shuttle/Re-su	Supply Run	Venice Based	
KL	WB2	Katie Lynn	Shuttle/Re-su	Supply Run	Venice Based	
EV	WB2	Eveready	NRC Re-suppl	Supply Run	Venice Based	
MW	WB2	Miss Wynter	NRC Re-suppl	Supply Run	Venice Based	
BC	WB2	Ben Charamie	Shuttle/Re-su	Supply Run	Venice Based	
Inland Barges						
331	TV3	Cenac 331 Barge	TF Storage	5,000 bbl open	Ft Jackson	
323	TV3	Cenac 323 Barge	TF Storage	21,000 bbl open	Venice	
324	TV3	Cenac 324 Barge	TF Storage	21,000 bbl open	Venice	
HM-3048	TV3	Higman 3048 Barge	TF Storage	Full	Enroute	Houston
HM-3049	TV3	Higman 3049 Barge	TF Storage	8,000 bbl open	Venice New Park	

SAFETY ASPECTS OF AERIAL DISPERSANT OPERATION IN SUMMERTIME

Safety issue:

The unintended consequences of delayed dispersant approval are:

- Less time to deal with severe weather.
- Introduces uncertainty that increase risks.

Operational Considerations:

Normal summer time weather patterns in the Gulf of Mexico are fairly predictable. Scattered air mass thunderstorms form offshore in the early morning and build in intensity during the morning. By midday they have strengthen and are drawn ashore. Once overland they continue to build in strength causing heavy thunderstorms and winds. These thunderstorms lose their energy and begin to dissipate during the late afternoon (after 4:00 PM).

Visualization is most difficult in low angle light and under cloudy conditions.

Current Situation:

Aerial Dispersants are submitting an approval request late in the day before, requesting approval to spray designated areas with defined amounts of dispersant.

The spotter aircraft depart in the early morning and look for "sprayable" oil. These reports are consolidated into a request report and sent for approval. These flights, submitting the reports and the approval cause the first flight to be approved as the thunderstorms start to build and limit the effectiveness of the flight.

Proposed Solutions:

A pre-approved amount of dispersant that can be applied in the early morning, prior to the heavier weather affecting the flights.

A secondary approval based on spotter reports developed during the morning. The secondary approval would be dispersed as weather allows, perhaps later in the day as the weather improves.

Risk Assessment:

By having a pre-approved amount for early morning flights, crewing can be scheduled to minimize the fatigue induced by waiting at the airport for approval then scrambling to fuel, load dispersant, file flight plans and prepare the aircraft for departure. While these are normal duties and problems for flight crews it is still fatiguing and can cause safety issue by "rushing" to accomplish the mission.

The pre-approval would cause less stress process thus mitigating the risk involved mentioned above.

By allowing a secondary request for approval the follow on crews will also be exposed to a much more orderly approach to the mission, especially in the selection of flight time that imposes the least risk from the weather .

As the project draws on the risk level increase and mitigation factors need to be investigated.